

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

STATE OF TEXAS, *et al.*,
Defendants.

No. 5:21-cv-00844-XR
(Consolidated Cases)

**DECLARATION OF
JONATHAN BASH IN
FURTHER SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL**

I, JONATHAN BASH, declare under penalty of perjury pursuant to 28 U.S.C. §1746 as follows:

1. I am an associate with the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP. I make this declaration in support of the LUPE Plaintiffs', the HAUL Plaintiffs' and the LULAC Plaintiffs' reply papers in further support of their motion to compel document production and interrogatory answers from Defendant Intervenors Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would competently testify, to the best of my knowledge to the matters set forth below.

2. A true and correct copy of the First Set of Requests for Production dated September 19, 2022 that Defendant Intervenors served on the LUPE Plaintiffs is attached hereto as Exhibit A.

3. A true and correct copy of the First Set of Interrogatories dated September 19, 2022 that Defendant Intervenors served on the LUPE Plaintiffs is attached hereto as Exhibit B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on November 7, 2022 in New York, New York.

/s/ Jonathan Bash
JONATHAN BASH